

One World Financial Center
27th Floor
New York, NY 10281
(212) 796-6330



1101 17th Street, NW
Suite 1006
Washington, DC 20036
(202) 470-0330

www.morvillolaw.com

WRITERS CONTACT INFORMATION
gmorvillo@morvillolaw.com
(212) 796-6340

February 2, 2015

VIA ELECTRONIC MAIL

Honorable Richard J. Sullivan
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2104
New York, New York 10007

Re: *United States v. Newman, et al.*, S2 12 CR 121 (RJS)

Dear Judge Sullivan:

As the Court is aware, we represent Anthony Chiasson in this matter and write in response to the government's letter, dated February 2, 2015, regarding the unsealing of certain search warrant materials executed in connection with the raid on Level Global Investors LP. The government proposes to redact portions of the search warrant materials that implicate the privacy rights of third parties. In light of the government's request, which is based upon negotiations with the New York Times to which Mr. Chiasson was not privy, we write to propose further redactions.

Essentially, the government proposes to redact the identity of individuals who were not publicly identified at trial. Because there will not be a full unsealing of the search warrant materials, Mr. Chiasson requests permission to submit proposed redactions that would prevent the disclosure of his name relating to information and allegations pertaining to him that were not made public at trial or in any charging document. Mr. Chiasson can provide the Court with his proposed redactions in accordance with the government's schedule, on or before February 13, 2015.

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I am available at the Court's convenience should it require further discussion of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. Morvillo', enclosed within a large, loopy oval flourish.

Gregory Morvillo

cc: David McCraw (via e-mail at mccraw@nytimes.com)
All counsel of record